



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

In Reply Refer To:
ER 02/0706

NOV 25 2003

Mr. Fred Pierson
Department of the Navy
Atlantic Division, Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, Virginia 23511-2699

Dear Mr. Pierson:

The U.S. Department of the Interior has reviewed the Department of the Navy's (Navy) Final Environmental Impact Statement (EIS) for the Introduction of the F/A-18 E/F (Super Hornet) Aircraft to the East Coast of the United States, dated July 2003. We understand that the task of locating new homebasing and practice facilities for the Super Hornet aircraft is a challenge, and the Navy has done a good job of seeking public input. We appreciate the hard work that has gone into preparation of the Final EIS. However, the Department's U.S. Fish and Wildlife Service (FWS) has concerns with the preferred alternative and believes impacts to National Wildlife Refuge-related waterfowl wintering habitat and certain refuge operations are underestimated by the Navy. We could accept any of several alternatives not currently preferred by the Navy and offer suggestions for a particular alternative.

We bring the Navy's attention to three points which we believe need clarification. We are requesting these items be analyzed through the National Environmental Policy Act (NEPA) process to give the public a better understanding of the alternatives analysis. Our comments are submitted pursuant to, and in accordance with, provisions of the Fish and Wildlife Coordination Act, as amended, (16 U.S.C. § 661 et seq.), the Migratory Bird Treaty Act (16 U.S.C. § 703 et seq.), the Sikes Act, as amended (16 U.S.C. § 670a et seq.), and the Endangered Species Act of 1973, as amended (16 U.S.C. § 1531 et seq.).

First, we remain concerned about the impacts of the preferred alternative Outlying Landing Field (OLF), OLF Site C. Our concerns are with the impacts that OLF Site C aircraft operations will have on wildlife, wildlife management, and conservation actions at Pocosin Lakes National Wildlife Refuge (PLNWR). While page 2-104 acknowledges that some site-specific impacts to waterfowl in the vicinity of the OLF may occur, we believe the summary on page 2-105 suggesting that birds and wildlife at PLNWR "would not be affected" by operations at OLF Site C is far too conclusive. Impacts from aircraft noise are actually expected at PLNWR (SEL modeled at 79-93 dB, page 12-122), and the magnitude of those impacts needs to be better evaluated, particularly with regard to noise impacts on waterfowl and other wildlife. The OLF

Site C is located in Washington County, and lies just west of the 12,000-acre Pungo Unit and the 600-acre B Canal Tract of PLNWR. Most of the adjacent lands in the OLF Site C area of influence are private agricultural lands that serve as important foraging areas for migratory birds. The Pungo Unit of PLNWR was established specifically as a waterfowl sanctuary, and 100,000 birds annually winter on the unit. Average peak numbers of tundra swans on the Pungo Unit are approximately 25,000, and snow goose numbers hit an all-time high of 65,000 this past year. Most of these birds regularly fly out to feed in the private agricultural fields to the west of the Pungo Unit, in the vicinity of OLF Site C. These flights occur both during the day and at night and are unpredictable. In addition to wintering waterfowl, the Pungo Unit hosts thousands of other migrant and resident birds throughout the year, many of which also feed in the surrounding agricultural fields.

We request that the substantial waterfowl survey database that FWS has acquired over the years of operating PLNWR be used to evaluate noise impacts to waterfowl and wildlife on PLNWR; we believe the historic record puts the limited data from the Navy's recent observations in their appropriate context. Use of our larger database would improve the accuracy and precision of noise impact modeling. This is particularly important given the addition of holding patterns and approach path locations, both of which are now shown to occur within 0.2 miles of the PLNWR boundary (a change from the Draft EIS to the Final EIS). The Final EIS indicates that, although these flight tracks are represented by single lines on the map, a band would be a better representation since many factors affect the actual flight path. This seems to indicate that approaching aircraft and aircraft in the holding pattern will likely routinely fly over PLNWR.

The FWS defers to the Navy's bird-aircraft hazard conclusions. We suggest that the Navy take advantage of our survey records as a sort of quality control on the assumptions and information used in the risk management assessment. These waterfowl-use records are available upon request or for review at the FWS's field offices.

Second, the FWS is very concerned with the conclusion that OLF Site C offers "compatible land uses" (page 2-75). Since the early stages of this project, the FWS has maintained that the wildlife management land uses adjacent to refuges and other areas managed to attract migratory birds and other wildlife are not compatible with increased low-level air traffic. The site includes parcels that the Department has enabled private landowners to manage for conservation and wildlife. We also remain concerned that this conclusion does not address our previously stated concern about the impacts that operations at OLF Site C will have on visitation at PLNWR. Visitors come to refuges to enjoy wildlife-dependent recreational activities such as hunting and bird and bear watching. We request the Navy to consider a more detailed analysis of this impact,

particularly the peak noise level impacts (which were not a focus in the existing analysis because averages were used).

Finally, we respectfully request that additional alternatives be evaluated, specifically, the Carteret County OLF siting alternative evaluated in the Draft EIS. This site was dropped from the Final EIS because of the Navy's determination of operational constraints on other Department of Defense facilities in the region. We recommend the Carteret County site be reassessed with consideration of the following positive attributes: (1) the Open Grounds Farm parcel within the county has the acreage needed for the OLF as defined in the Final EIS; (2) environmental organizations in North Carolina have advocated the Open Grounds Farm site since 1994, and the Navy would be welcomed at this location due to the opportunities for environmental restoration; (3) purchase from a single corporate farming operation would likely be less expensive based on land costs and the need to displace fewer homes and families; and (4) the wetland restoration opportunities on this tract are real. Restoring wetland hydrology in conjunction with OLF construction would help cure long recognized water quality problems in the Neuse River affecting shellfish populations and would also protect water quality in Core Sound. This type of wetland restoration would not attract waterfowl and would improve opportunities for recreational and commercial fishing. We believe the Navy would get a substantial amount of praise and positive feedback for working to restore water quality in the Neuse River (one of North Carolina's highest priority impaired water bodies). While that site would not be free of environmental impacts (including those to birds as referenced in the February 2002 comments on the project), it is our opinion that these impacts would be far less than those associated with development and operation of OLF Site C.

We encourage the further consideration of the Carteret County option which we believe to have some significant advantages under your site evaluation criteria. If the air traffic constraints on adjacent Marine and Navy facilities can be managed (an issue on which we defer to the Navy's expertise), this site may well offer the "win-win" solution so often sought. We request the Navy to reconsider this site. We also suggest the Navy continue to use the NEPA process as an opportunity to address the concerns we have outlined and to consider other siting alternatives (OLF Site E, in Craven County, OLF Oak Grove, in Jones County, and OLF Atlantic, in Carteret County, or constructing parallel runways to existing facilities).

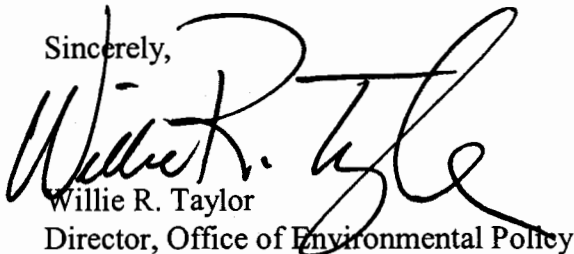
Again, we recognize the seriousness and magnitude of your task in locating homebasing and OLF facilities in the mid-Atlantic, and we appreciate the opportunity to comment on this proposed action. We also appreciate the work that has been done to date, and we encourage the further consideration of the options described above, which we believe to have some significant advantages under your site evaluation criteria. We would be pleased to provide additional technical assistance upon request.

Mr. Fred Pierson

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If you have any questions or comments, please contact Dr. Garland Pardue of the FWS's Raleigh Office at 919-856-4520, extension 11. Additional queries may also be directed to Ken Havran in the Office of Environmental Policy and Compliance at 202-208-7116.

Sincerely,



Willie R. Taylor
Director, Office of Environmental Policy
and Compliance